

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Ann L. Pierce

Debtor

Chapter: 13

Bankruptcy No.: 19-17288-pmm

11 U.S.C. § 362

U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Loan Acquisition Trust 2017-RPL1

Movant

vs.

Ann L. Pierce

Debtor

and

Scott F. Waterman

RESPONDENTS

**PRAECIPE TO WITHDRAW OBJECTION OF U.S. BANK TRUST NATIONAL ASSOCIATION,
NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR LOAN
ACQUISITION TRUST 2017-RPL1, TO CONFIRMATION OF DEBTOR`S PROPOSED
CHAPTER 13 PLAN**

TO THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, EASTERN DISTRICT OF PENNSYLVANIA

Kindly withdraw the Objection to U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Loan Acquisition Trust 2017-RPL1, to Confirmation of Debtor's Proposed Chapter 13 Plan in the above captioned matter.

Respectfully submitted,

/s/ Chandra M. Arkema
Richard M. Squire, Esq.
M. Troy Freedman, Esq.
Chandra M. Arkema, Esq.
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Attorney for Movant

Dated: January 20, 2021

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Scott F. Waterman

Trustee

RESPONDENTS

CERTIFICATE OF SERVICE

I hereby certify that I am over 18 years of age; and that service upon all interested parties, indicated below, was made by sending true and correct copies of the Praeclipe to Withdraw Objection of U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Loan Acquisition Trust 2017-RPL1, to Confirmation of Debtor's Proposed Chapter 13 Plan electronically and/or via First Class Mail, postage prepaid.

Date Served: January 20, 2021

Scott F. Waterman
Chapter 13 Trustee
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

Ann L. Pierce
2148 Butler Street
Easton, PA 18042

David S. Gellert, Esquire
1244 W. Hamilton Street
Suite 204
Allentown, PA 18102

I hereby certify the foregoing to be true and correct under penalty of perjury.

Respectfully submitted,

/s/ Chandra M. Arkema
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